

1 HONORABLE MARSHA J. PECHMAN
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

9 DYLON DYKSTRA, individually and on
10 behalf of all others similarly situated,

11 Plaintiff,

12 vs.

13 THE SHIELD CO. MANAGEMENT, LLC
14 dba ECOSHIELD MANAGEMENT CO.,
15 LLC, an Arizona limited liability company;
16 and DOES 1-20,

17 Defendants.

18 NO. 2:23-cv-01908

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20 **STIPULATION FOR FILING OF
21 FIRST AMENDED COMPLAINT**

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23 IT IS HEREBY STIPULATED by and between the parties hereto through their
24 respective attorneys of record that Plaintiff Dylon Dykstra (“Plaintiff”) may file the Proposed
25 First Amended Complaint, a copy of which is attached hereto, with amendments in bold, and
26 that such complaint shall be deemed filed and served as of the date of the filing of this
27 Stipulation.

28 WHEREAS the parties met and conferred about the amending the Complaint for
29 Plaintiff;

30 WHEREAS Defendant Ecoshield Pest Solutions Seattle, LLC (“Defendant”) agreed to

1 stipulate to Plaintiff amending the Complaint to replace Defendant, who is not the employer for
2 Plaintiff or any of the putative class members, with The Shield Co. Management, LLC dba
3 Ecoshield Management Co., LLC;

4 WHEREAS the proposed First Amended Complaint is attached hereto as Exhibit A;

5 IT IS FURTHER STIPULATED that The Shield Co. Management, LLC dba Ecoshield
6 Management Co., LLC may file its Answer to the First Amended Complaint within 30 days
7 from the date of the filing of this Stipulation.

8 **IT IS SO STIPULATED:**

9 Dated: February 7, 2024.

EMERY REDDY, PLLC

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11 By: /s/ Timothy W. Emery
12 By: /s/ Patrick B. Reddy
13 By: /s/ Paul Cipriani
14 Timothy W. Emery, WSBA No. 34078
Patrick B. Reddy, WSBA No. 34092
Paul Cipriani, WSBA No. 59991
15 Attorneys for Plaintiff Dylon Dykstra

16 Dated: February 7, 2024.

FISHER & PHILLIPS LLP

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18 By: /s/ Matthew J. Macario
19 By: /s/ Sieu K. Che
20 Matthew J. Macario, WSBA #26522
Sieu K. Che, WSBA #40422
21 Attorneys for Defendant Ecoshield Pest
Solutions Seattle, LLC

22 **IT IS SO ORDERED:**

23 Dated: February 8, 2024.

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MARSHA J. PECKMAN
United States Senior District Judge